

Lewin & Baglio, LLP

Attorneys and Counselors at Law

Partners:
Lev J. Lewin, Esq.
Michael P. Baglio, Esq.

1100 Shames Drive
Suite 100
Westbury, NY 11590
(516) 307-1777 (Office)
(516) 307-1770 (Fax)

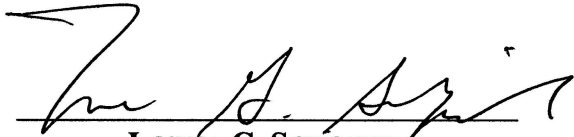
October 17, 2023

VIA ECF

Application **DENIED** without prejudice to renewal after the stay of this case is lifted. Similarly, Defendant's applications regarding its proposed motions to dismiss are denied without prejudice to renewal. So Ordered.

The Clerk of Court is respectfully directed to close the motions at Dkts. 9, 18 and 21.

Dated: December 27, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: NORMAN MAURICE ROWE, M.D., M.H.A., L.L.C. & EAST COAST PLASTIC SURGERY, P.C. against AETNA LIFE INSURANCE COMPANY; 1:23-cv-08297-LGS; Leave to Amend Complaint

Your Honor:

Lewin & Baglio, LLP, represents the Plaintiffs ("The Providers") in the above referenced matter. We write in response to Defendant's Letter seeking a pre-motion conference regarding its anticipated Motion to Dismiss the Complaint (Doc #18, Letter Dated, October 10, 2023). We wholeheartedly disagree with Defendant's assertions.

Nevertheless, we seek leave to amend the Complaint pursuant to FRCP Rule 15(a). Our intention is to re-name the Defendant and/or name an additional defendant, if necessary; state certain facts with particularity; allege new facts with specificity; and raise new causes of action, if possible.

Lewin & Baglio, LLP, is available at the Court's convenience.

Respectfully,
Michael Baglio
Lewin & Baglio, LLP
Attorneys for Plaintiff

CC: All Counsel via ECF